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• ADMITTED IN FEDERAL AND  
NEW YORK STATE COURTS

January 19<sup>th</sup>, 2023

Honorable Katherine Polk Failla  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

RE: **United States of America v. Shpendim Haxhaj**  
1:21-cr-00017-KPF-1  
Assignment of Paralegal

**MEMO ENDORSED**

Dear Judge Failla,

With the Court's permission, I would like to have Ms. Karen Ramirez assigned as a paralegal to assist me with the trial and trial preparation in the above referenced matter. Ms. Ramirez has been trained to conduct in-depth legal interviews, organize files, perform research, and review discovery for strategic purposes. It would be a great assistance to the undersigned if the Court would appoint Ms. Ramirez's paralegal responsibilities for general paralegal duties in the above-referenced multi-defendant matter.

Ms. Ramirez is a Rutgers University graduate with a B.A. in Psychology and Criminology. Ms. Ramirez has been employed by my firm since 2016.

For all the aforementioned reasons, I firmly believe that Karen Ramirez should be appointed paralegal responsibilities at a rate of \$75.00 per hour for a maximum of 100 hours. Notably, Ms. Ramirez's appointment will reduce the number of hours required to strategically review/organize the voluminous discovery in this matter including but not limited to the several thousand pages of entries that are relevant to this matter as well as provide necessary assistance in the effective assistance of defense during the trial stage of this matter. Furthermore, Ms. Ramirez will also assist in reviewing discovery with the defendant. Thank you kindly in advance for your consideration.

Sincerely,

*Alain V. Massena*

Alain V. Massena, Esq.

Applications GRANTED. The Court is in receipt of the above request for paralegal assistance, and defense counsel's request for co-counsel entered at docket number 151. The Court hereby ORDERS the appointment of A. James Bell as associate CJA counsel to Defendant Shpendim Haxhaj for an initial 100 hours at a rate of \$110.00 per hour without prejudice to seeking authority for additional time should discovery review exceed 100 hours. The Court similarly ORDERS the appointment of Karen Ramirez as a paralegal for Defendant Shpendim Haxhaj at a rate of \$75.00 per hour for a maximum of 100 hours.

The Clerk of Court is directed to terminate the pending motions at docket numbers 151 and 152.

Dated: January 20, 2023  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE